

UNITED STATES DISTRICT  
COURT FOR THE DISTRICT OF  
NEW JERSEY

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IN RE: JOHNSON & JOHNSON ) MDL No. 2738 (MAS)  
(RLS) TALCUM POWDER PRODUCTS )  
MARKETING, SALES PRACTICES, ) AND PRODUCTS LIABILITY )  
LITIGATION )

*This document relates to:* )

*Brianna Chisholm- 3:18-cv-13412* )

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**PLAINTIFF'S RESPONSE TO THE COURT'S ORDER TO SHOW CAUSE**

The below undersigned counsel of record for Plaintiff Brianna Chisholm submits the following Response to the Court's August 15, 2024 Order to Show Cause Why Cases on the Attached Exhibit A Should Not Be Dismissed With Prejudice (Dkt. 33096).

On August 30, 2018, the undersigned filed suit directly into MDL No. 2738 on behalf of Plaintiff Brianna Chisholm. Pursuant to the Court's Amended Plaintiff Profile Form Order dated September 1, 2023, a Plaintiff Profile Form, medical records and signed authorizations were to be served on Defendants by December 7, 2023.

Counsel for Plaintiff have, as best possible and as of the filing of this Response, have submitted a Plaintiff Profile Form (PPF) pursuant to protocol in this MDL. Accordingly, Counsel asserts that the PPF moots the need to dismiss this matter with prejudice and the PPF should be submitted to the review and deficiency process, if any, as otherwise set out in this MDL. Counsel for Defendants have expressed agreement to remove this case from this list of cases to be dismissed with prejudice.

Date: September 5, 2024

Respectfully submitted,

/s/ T. Roe Frazer II

T. Roe Frazer II; Bar No. 35785-PHV

FRAZER PLC

30 Burton Hills Boulevard, Suite 450

Nashville, TN 37215

Telephone: 615.647.6464

Facsimile: 615.307.4902

Email: roe@frazer.law

*Counsel for Plaintiff*